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March 7, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attn: Wireline Competition Bureau

Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest

Dear Ms. Dortch:

Massillon Cable TV, Inc. (MCTV) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, reliable, and scalable high-speed Internet service to unserved high-cost areas.

MCTV is a privately held multiple system operator providing High-speed Internet, telephone, television and security monitoring services to 45,000 residential, commercial and institutional locations in northeast Ohio. Founded in 1965, MCTV continues to be locally owned and operated. MCTV is widely respected for unique technical innovations including WatchTVEverywhere, SubscriberWise, proactive maintenance and other developments shared with small- and mid-sized operators to enhance performance, efficiency and customer service.

MCTV service areas range from small cities to suburbs to very rural communities, including Amish areas without electricity. MCTV regularly builds new Fiber-To-The-Home projects to additional rural areas.

MCTV is interested in providing our current level of services to presently unserved areas, specifically to the census tracts included in Exhibit A. We believe that many of these locations can be served with only modest one-time support; typically two-and-a-half years of the anticipated Annual Support and then no further support.

MCTV currently provides a full array of telecommunication products, including:

- direct fiber
- dark fiber, building-to-building interconnections
- DOCSIS service packages (starting at $25/month) with speeds up to 20Mbps,
- IP-based phone service, with and without long-distance, including up to 22 popular calling features,

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- full-featured all-digital TV service, 380 channels, HDTV, VOD, TVEverywhere, Whole Home DVR, IP streaming video, etc.

MCTV currently provides dark fiber connections among all local schools, fiber interconnections to county computer centers, city and township governments, libraries, museums and other locations; basically, any location has access to fiber and/or high-speed connections upon request.

MCTV's service area is a mixture of urban, suburban and rural neighborhoods. The technology deployed in any given area is either hybrid fiber coax or fiber-to-the-home based on density and other characteristics of efficiency. Most of the unserved areas contemplated here will be fiber-to-the-home architecture. All service areas, regardless of density or technology, enjoy the same suite of services at the same rates and with the same high level of local customer service.

Most of the census tracts involved already have some measure of broadband availability, so these projects require plant extensions only, not the construction of any new core technology centers. MCTV's initial goal in any new area is to create fiber connections to local schools and interconnections to the county computer center. However, nearby population centers, suburbs and transportation corridors already have service so most of the tracts involved have few or no anchor institutions.

There are, however, some basic questions about providing service under these experimental projects that need to be clarified.

Identity of locations

Many of the census tracts included in Exhibit A have a very small number of locations; as small as only one or two unserved locations. Some "unserved" locations may already be passed by broadband service, but the owner has expressed no interest in extending the service onto their property. Or, unserved locations may lie on the opposite side of a census tract. For these reasons, it is imperative to know the location of unserved homes and businesses before an accurate analysis of cost is possible. Not all FTTH projects should cost $4,000/home. But, in the absence of accurate information, applicants will be forced to include all possible costs in all proposals; producing the same inefficiencies that exist today. Will the FCC provide the identity of the unserved locations prior to the submission of proposals?

Requirement to construct to all existing locations

The geography of some census tracts creates great difficulty in efficiently building infrastructure. While extremely rural areas have great distances, some less rural areas have other challenges, like interstate highways or railroads leading to a complete lack of pole continuity. Is a single provider required to construct infrastructure past all currently unserved locations? Can some unserved Extremely High Cost Locations be served by an alternate technology?

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Ability to "split" tracts

Many of the tracts in Exhibit A are on the outskirts of two or more communities served by two different providers. It is uneconomical for either to serve the entire tract, but it might be feasible if the two providers cooperate and "split" a census tract into two sets of census blocks (for example, north and south of a river). Would such cooperation be allowed? Would coordination among otherwise competing companies be protected from claims of anti-competitive behavior?

Requirement to construct to all future locations

Another difficulty in analyzing an unserved area is the unknown element of future homes or businesses. Would a successful applicant be considered a "carrier of last resort" and, therefore, be required to extend service to any location within a census tract? If so, under what terms must that extension be completed?

Installation Cost Recovery

Traditionally, cable providers have invested in infrastructure on public roads and provided standard installation within a reasonable distance from those roads. However, in more rural (and sometimes not-so-rural) areas, homes are constructed great distances from the road. To what extent is a provider allowed to recover the costs of installation from a property owner in a census tract subject to support?

Continuation of support to current carriers

The most significant question is to what extent will support continue to be provided to price cap carriers already operating in these unserved areas? A second entrant into any market, even with a superior product, faces significant obstacles to success if the incumbent continues to receive a subsidy. What is the expectation for continued support?

Please contact me if you have any questions.

Sincerely,

Robert Gessner

Robert Gessner
President

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EXHBIT A

State	County	CountyName	TractID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support
OH	39151	Stark	39151711202	12	0	3280.39
OH	39151	Stark	39151714801	36	0	10352.12
OH	39151	Stark	39151714802	1	0	20532.87
OH	39151	Stark	39151714901	96	1	26125.23
OH	39151	Stark	39151714902	87	0	27046.96
OH	39157	Tuscarawas	39157020100	105	1	46738.06
OH	39157	Tuscarawas	39157020500	119	0	66986.84
OH	39169	Wayne	39169000500	4	1	3262.49
OH	39169	Wayne	39169000600	1	0	626.3
OH	39169	Wayne	39169000800	13	0	8823.93
OH	39169	Wayne	39169000900	18	0	4588.5
OH	39169	Wayne	39169001100	3	0	498.68
OH	39169	Wayne	39169001400	10	0	1469.32
OH	39169	Wayne	39169001700	400	1	72693.54
OH	39169	Wayne	39169001800	138	1	39810.37
OH	39169	Wayne	39169001900	159	3	74689.52
OH	39169	Wayne	39169002000	84	4	63883.1
OH	39169	Wayne	39169002100	45	0	52697.44
OH	39169	Wayne	39169002200	2	0	81351.16
OH	39169	Wayne	39169002300	86	0	55717.97
OH	39169	Wayne	39169002500	112	0	70230.78
OH	39169	Wayne	39169003000	132	2	19753.98
OH	39169	Wayne	39169003300	106	2	33572.25
OH	39169	Wayne	39169003400	12	1	5228.84
OH	39169	Wayne	39169003500	24	0	8817.3
OH	39169	Wayne	39169003700	44	2	5291.84